

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:
CUMMINGS MANOOKIAN, PLLC
Debtor.
JEANNE ANN BURTON, TRUSTEE
Plaintiff,
v.
HAGH LAW, PLLC; AFSOON HAGH; and MANOOKIAN PLLC,
Defendants.

Case No. 3:19-bk-07235
Chapter 7
Judge Walker
Adv. Proc. No. 3:20-ap-90002

**BRIAN MANOOKIAN AND MANOOKIAN PLLC'S
NOTICE OF APPEAL AND STATEMENT OF ELECTION**

Manookian PLLC and Brian Manookian, through counsel, gives notice of his appeal from the Bankruptcy Court's June 1, 2022 Order (Doc 178). In furtherance of the same, Mr. Manookian states as follows.

Part 1: Identity of Appellant

1. The names of the appellants are Brian Manookian and Manookian, PLLC. Mr. Manookian is the sole owner and member of the Debtor, Cummings Manookian, PLLC as well as the sole owner and member of Adversary Proceeding Defendant, Manookian, PLLC.

Part 2: Subject of the Appeal

2. Mr. Manookian appeals from the Court's Order Quashing Notice of Deposition (Doc. 178). The Order was entered on June 1, 2021.

Part 3: Parties to the Appeal

3. The names of the Parties to the Order appealed from as well as the contact information for their attorneys are:

- a. Debtor Cummings Manookian,
Jay R. Lefkovitz
Lefkovitz & Lefkovitz, PLLC
312 East Broad Street, Suite A
Cookeville, TN 38501
(931) 528-5297 (T)
931-526-6244 (F)
JLefkovitz@lefkovitz.com
- b. Trustee Jeanne Anne Burton
Phillip Young
One Franklin Park
6100 Tower Circle, Suite 200
Franklin, TN 37067
(615) 465-6008 (T)
phillip@thompsonburton.com
- c. Creditor Grant, Konvalinka & Harrison, P.C.,
John P. Konvalinka
Grant, Konvalinka & Harrison, P.C.
633 Chestnut Street Suite 900 Republic Centre
Chattanooga, TN 37450-0900
(423) 756-8400 (T)
(423) 756-6518 (F)
jkonvalinka@gkhpc.com
- d. Creditor D.F. Chase, Inc.
Daniel Puryear
Puryear Law Group
104 Woodmont Boulevard, Suite 201
Nashville, TN 37205
(615) 255-4859 (T)
(615) 630-6602 (F)
dpuryear@puryearlawgroup.com

Part 4: Election to have appeal heard by District Court

4. Mr. Manookian elects to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

Date: June 14, 2022

Respectfully submitted,

/s/ John Spragens
John Spragens (TN Bar No. 31445)
Spragens Law PLC
311 22nd Ave. N.
Nashville, TN 37203
T: (615) 983-8900
F: (615) 682-8533
john@spragenslaw.com

*Attorney for Manookian PLLC and
Brian Manookian*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed June 14, 2022 and served electronically upon all parties in interest or their counsel as indicated on the receipt issued by the Court's electronic filing system.

/s/ John Spragens